

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

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**SECURITIES AND EXCHANGE COMMISSION,**

**Plaintiff,**

v.

**Case No.: 3:23-cv-02146-D**

**PHILIP VERGES, JAMES D. TILTON, JR.,  
ROBERT F. MALIN, LINDA MALIN, and  
BLUE CITI, LLC,**

**Defendants,**

**SMEA2Z, LLC, 143 PARTNERS LLC, WEST  
CUCHARRAS, LLC, and JDT TRADING, LLC,**

**Relief Defendants.**

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**PLAINTIFF'S NOTICE OF NON-OPPOSITION TO THE RELIEF  
REQUESTED IN DEFENDANT PHILIP VERGES'S MOTION TO STAY  
AND DEFENDANTS BLUE CITI LLC, ROBERT F. MALIN,  
AND LINDA MALIN'S MOTION TO STAY**

Plaintiff Securities and Exchange Commission (the “Commission”) files this notice of non-opposition to the relief requested in Defendant Philip Verges’s (“Verges”) Motion to Stay [Dkt. No. 51] (“Verges Motion”) and Defendants Blue Citi, LLC, Robert F. Malin, and Linda Malin’s (collectively, “Blue Citi Defendants”) Motion to Stay [Dkt. No. 52] (“Blue Citi Motion”).

The Commission respectfully suggests that, if granted, any order concerning the Verges Motion or the Blue Citi Motion require Verges and the Blue Citi Defendants to notify the Court and counsel of record in writing within five (5) days of any order or judgment concluding *United States v. Verges*, No. 3:24-cr-00551-E (N.D. Tex.).

Dated: January 13, 2025

Respectfully submitted,

/s/ Jason P. Reinsch

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ATTORNEYS FOR PLAINTIFF SECURITIES  
AND EXCHANGE COMMISSION

**CERTIFICATE OF SERVICE**

I hereby certify that on January 13, 2025, I electronically filed the foregoing via the Court's CM/ECF filing system, which will send a notice of electronic filing to all CM/ECF participants. I further certify that I served a true and correct copy of the foregoing document and the notice of electronic filing via electronic mail on all non-CM/ECF parties and/or their counsel as detailed below:

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/s/Jason P. Reinsch  
 JASON P. REINSCH